## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION RECEIVED

| Time Too   | MAY 2                                    | <b>8</b> 2008              |
|--|--|----------------------------|
| )  |  | V. DOBBINS<br>INTRICT COUR |
| (Name of the plaintiff or plaintiffs)  v.  (Name of the plaintiff or plaintiffs)  )  (Name of the defendant or defendants) | CIVIL ACTION  08 C 5 0 0 93  NO.         |                            |
| COMPLAINT OF EMPLOY  1. This is an action for employment discriminati  |  |                            |
| 2. The plaintiff is Tyra 500   |  | of the                     |
| county of <u>Winnebago</u> 3. The defendant is <u>Knawledge Le</u>   | in the state of TL                       | <br>, whose                |
| street address is 4345 Maray   | Drive                                    |                            |
| O. VC 1  | state) (ZIP) (0                          |                            |
| (Defendant's telephone number)   |  |                            |
| The plaintiff sought employment or was employed.   | oyed by the defendant at (street address | s)                         |
|  | (city)                                   | ·<br>                      |
| (county) (state) (ZIP  | code)                                    |                            |

| 5. The plaintiff [check one box]   |  |  |
|--|--|--|
| (a) was denied employment by the defendant.  |  |  |
| (b) was hired and is still employed by the defendant.  |  |  |
| (c) was employed but is no longer employed by the defendant.   |  |  |
| 6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) (day) (year) 2000. |  |  |
| 7.1 (Choose paragraph 7.1 or 7.2, do not complete both.)   |  |  |
| (a) The defendant is not a federal governmental agency, and the plaintiff [check                                       |  |  |
| one $box$ ] has not filed a charge or charges against the defendant  |  |  |
| asserting the acts of discrimination indicated in this complaint with any of the following government agencies:        |  |  |
| (i) I the United States Equal Employment Opportunity Commission, on or about (month) September (day) 20 (year) 2006.   |  |  |
| (ii) the Illinois Department of Human Rights, on or about  |  |  |
| (month) December (day) 8 (year) 2006.  |  |  |
| (b) If charges were filed with an agency indicated above, a copy of the charge is                                      |  |  |
| attached. YES. NO, but plaintiff will file a copy of the charge within 14 days.  |  |  |
| It is the policy of both the Equal Employment Opportunity Commission and the Illinois                                  |  |  |
| Department of Human Rights to cross-file with the other agency all charges received. The                               |  |  |
| plaintiff has no reason to believe that this policy was not followed in this case.                                     |  |  |
| 7.2 The defendant is a federal governmental agency, and  |  |  |
| (a) the plaintiff previously filed a Complaint of Employment Discrimination with the                                   |  |  |
| defendant asserting the acts of discrimination indicated in this court complaint                                       |  |  |

|    |             |                  | Yes (month)                 | (day)                   | (year)                        |
|----|-------------|------------------|-----------------------------|-------------------------|-------------------------------|
|    |             |                  | No, did not file Compl      | laint of Employment     | Discrimination                |
|    | <b>(</b> b) | The plainti      | ff received a Final Agend   | cy Decision on (mont    | h)                            |
| ı  |             |                  | (year)                      |                         |                               |
|    | (c)         | Attached is      | a copy of the               | ,                       |                               |
|    |             | (i) Compla       | unt of Employment Discr     | imination,              |                               |
| ;  |             | X YE             | NO, but a cop               | y will be filed within  | 14 days.                      |
|    |             | (ii) Final Ag    | gency Decision              | ·                       |                               |
|    |             | ⊠ <sub>YE</sub>  | S NO, but a cop             | y will be filed within  | 14 days.                      |
| 8. | (Comp       | lete paragrap    | oh 8 only if defendant is n | ot a federal governm    | nental agency.)               |
|    | (a)         | the Unite        | ed States Equal Employm     | nent Opportunity Con    | nmission has not issued       |
|    |             | a Notice         | of Right to Sue.            |                         |                               |
| :  | (b)         | the Unite        | ed States Equal Employm     | ent Opportunity Con     | nmission has issued a         |
| •  |             | Notice of        | Right to Sue, which was     | received by the plain   | tiff on                       |
|    |             | (month)          | December (day)              | (year) <u>200</u> (     | 2 a copy of which             |
|    |             | <i>Notice</i> is | attached to this complain   | ıt.                     |                               |
| 9. |             | endant discrin   | minated against the plain   | tiff because of the pla | nintiff's [ <i>check only</i> |
|    | (a)         | Age (Age Di      | scrimination Employmen      | it Act).                |                               |
|    | (b)         |                  | VII of the Civil Rights Ac  | -                       | S.C. §1981).                  |

| •                  | (c) Disability (Americans with Disabilities Act or Rehabilitation Act)  |
|--------------------|---|
| (                  | (d) National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).  |
| . (                | (e) Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).   |
| (                  | f) Religion (Title VII of the Civil Rights Act of 1964)   |
| (                  | g) Sex (Title VII of the Civil Rights Act of 1964)  |
| g                  | f the defendant is a state, county, municipal (city, town or village) or other local overnmental agency, plaintiff further alleges discrimination on the basis of race, color, r national origin (42 U.S.C. § 1983).  |
| 11. Ju<br>cl<br>42 | arisdiction over the statutory violation alleged is conferred as follows: for Title VII aims by 28 U.S.C.§1331, 28 U.S.C.§1343(a)(3), and 42 U.S.C.§2000e-5(f)(3); for U.S.C.§1981 and §1983 by 42 U.S.C.§1988; for the A.D.E.A. by 42 U.S.C.§12117; the Rehabilitation Act, 29 U.S.C. § 791. |
| 12. Th             | e defendant [check only those that apply]   |
| (a)                | failed to hire the plaintiff.   |
| (b)                | terminated the plaintiff's employment.  |
| (c)                | failed to promote the plaintiff.  |
| (d)                | failed to reasonably accommodate the plaintiff's religion.  |
| (e)                | failed to reasonably accommodate the plaintiff's disabilities.  |
| (f)                | failed to stop harassment;  |
| (g)                | retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;  |
| (h)                | other (specify):  |
|                    |   |

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one teacher was allowed to go her be cause she had a hang over and another teacher was emotional upset because her grandmather passed and Lari treland allowed all three teachers to be released early. I was very upset that April I 2006. I felt that I was being treaded unfair because she allowed them to go home for varies reasons. I felt she treated me different because of my race on African pomerican.

| (g) \( \sum_{\text{1}} \) | If available, grant the plaintiff appropriate injuliquidated/double damages, front pay, comper prejudgment interest, post-judgment interest, attorney fees and expert witness fees.  Grant such other relief as the Court may find a | nsatory damages, punitive dama<br>and costs, including reasonable |
|---------------------------|--|---|
| (Plaintiff                | s signature)  s name)  |   |
| (Plaintiff                | s street address)  |   |
|                           | ephone number) 85-264296   |   |

To Whom it May Concern,

I Tina Joe would like to appeal my case against Knowledge
Learning Center, that is located at 4345 Maray Drive in Rockford, IL. 61107 where I was
employed as a Preschool Teacher.

Is I stated in my case, I believe that I have sufficient evidence that I was discriminated against and wrongfully terminated.

I don't believe that my case was fully investigated, do to the findings and the contradictory statements that were obtained.

I have documented proof of things that were not investigated to the fullest. This is why, I am appealing the decision I received. I would like you to review what I have, and maybe you too, would say that I was wrongfully terminated and suffered undo emotional stress, along with pain and suffering.

Thank you for your time and please just hear me out.

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Tina C. Joe

Date

## Human Rights COMMEMORATING 25 YEARS OF SERVICE

ROD BLAGOJEVICH, GOVERNOR ROCCO CLAPS, DIRECTOR

December 8, 2006

Ms. Tina C. Joe 1938 Rose Terrace Rockford, IL 61102

Re: <u>Tina C. Joe v. Knowledge Learning Center</u>, Control Number 071206068:

Dear Ms. Joe,

When you filed your charge of discrimination with the United States Equal Employment Opportunity Commission (EEOC) it was automatically filed with the Illinois Department of Human Rights. At this time, the Department is keeping a copy of your EEOC charge on file to preserve jurisdiction under Illinois law. It is important for you to understand that the Department is taking no other action on your charge at this time, and there is no need for you to contact the Department of Human Rights.

In the future, after you have received EEOC's determination and findings, if you wish to have the Department investigate your charge, you must notify the Department in writing within 35 days. Along with your letter, you must include a copy of EEOC's determination and findings. The letter should be sent to the Department of Human Rights, ATTN: Pre-Investigations/EEOC Charge, and sent via U.S. Postal certified mail, return receipt requested. If you choose to personally deliver the letter and EEOC's findings, you must bring an original and one copy of each. The copies will be stamped by the Department and should be kept for your records.

When the Department receives your letter, including a copy of EEOC's determination and findings, you will be sent a notice to perfect (you must sign and notarize) your EEOC charge. If you do not perfect the charge and return it to the Department within 35 days after you receive the Department's notice, the Department shall conclude that you do not want the Department to investigate your claim and shall close your case. Upon receipt of the perfected charge the Department may adopt the EEOC determination and findings.

It is not necessary that Respondent take any action at this time.

This letter does not apply to any settlement of this charge the parties have made with EEOC.

THE DEPARTMENT OF HUMAN RIGHTS

Cc: Knowledge Learning Center 4345 Maray Drive Rockford, IL 61107